

THE PARK LAW GROUP, LLC
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EASYTEX CORPORATION LIMITED,

Plaintiff,

v.

PETER & FRANK OF NY, CORP., CHUL KYU KIM a/k/a KIM CHUL KYU a/k/a CHUK CHUL KIM a/k/a ROBERT CHUL KIM a/k/a CHUL KYOO KIM a/k/a CHULKYOO KIM a/k/a KIM K. CHUL, BARO SHIPPING CO., LTD., TOP TEN TRANS, INC., GFA, INC., 3 WIN INC., MERCURY, AMERICAN INTERNATIONAL LINE, INC., SOON CHAN HONG a/k/a SOON C. HONG a/k/a SOONCHAN C. HONG a/k/a SOON CHAN HONG a/k/a CHAN S. HONG a/k/a HONG S. CHAN a/k/a HONG SOON CHANG d/b/a SOONCHAN HONG CUSTOM HOUSE BROKER, STOP & STOR, jointly and severally,

Defendants.

Civil Action No. 07-CV-03907 (BSJ)
(JCF)

ECF CASE

**CERTIFICATION OF
HYUN SUK CHOI, ESQ.
IN SUPPORT OF PLAINTIFF'S
APPLICATION FOR CLERK'S
CERTIFICATE OF DEFAULT
AGAINST DEFENDANT
BARO SHIPPING CO. LTD.**

Hyun Suk Choi hereby certifies that:

1. I am a member of the Bar of this Court and am associated with The Park Law Group, LLC, attorneys for Plaintiff Easytex Corporation Limited ("Plaintiff") in this action.

2. I am familiar with all the facts and circumstances in this action.

3. I make this Certification pursuant to Rule 55(a) of Federal Rules of Civil Procedure and Rule 55.1 of the Local Civil Rules for the Southern District of New York, in support of Plaintiff's application for Clerk's Certificate of Default against Defendant Baro Shipping Co., Ltd. ("Defendant").

4. On May 18, 2007, Plaintiff commenced this action by filing a summons and complaint against numerous defendants in this action.

5. On May 28, 2008, Plaintiff personally served Peter J. King, Acting General Counsel for the Federal Maritime Commission, which is the current legal agent for service of process for Defendant, with a copy of the summons and complaint.

6. On June 23, 2008, Plaintiff filed affidavit of service regarding summons and complaint as to Defendant. A true and correct copy of an Affidavit of Service is attached as Exhibit A.

7. On June 3, 2008, Plaintiff filed summons and amended complaint against numerous defendants in this action.

8. On June 16, 2008, Plaintiff personally served Peter J. King, Acting General Counsel for the Federal Maritime Commission, which is the current legal agent for service of process for Defendant, with a copy of the summons and amended complaint.

9. On July 18, 2008, Plaintiff filed affidavit of service regarding summons and amended complaint as to Defendant. A true and correct copy of an Affidavit of Service is attached as Exhibit B.

10. As of July 22, 2008, Defendant has failed to timely plead or otherwise defend this action.

11. A proposed form of Clerk's Certificate of Default against Defendant is attached as Exhibit C.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 22, 2008



Hyun Suk Choi, Esq. (HC4208)
Attorney for Plaintiff Easytex Corporation Limited